

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

DISTRICT OF NH

2025 MAR 24 P 8:16

24 HOUR DEPOSITORY

FRANK STAPLES and KATHLEEN BUSSIÈRE,
Plaintiffs,
v.
GOVERNOR CHRISTOPHER T. SUNUNU, et al.,
Defendants.

Civil Action No.: 1:24-cv-00331-LM-TSM

PLAINTIFFS' NOTICE OF DISCOVERY REQUESTS

NOW COME the Plaintiffs, Frank Staples and Kathleen Bussiere, pro se, and submit this Notice of Discovery Requests to inform the Court that, on March 20, 2025, Plaintiffs formally served discovery requests upon Defendants via email, in accordance with the Federal Rules of Civil Procedure and the Local Rules of the District of New Hampshire.

1. Summary of Discovery Requests

Plaintiffs' discovery requests seek information necessary to establish factual disputes related to Defendants' pending Motions to Dismiss (Docs. 22 & 23) and to support Plaintiffs' claims of unconstitutional government surveillance, venue manipulation, selective enforcement, retaliatory arrests, and excessive force.

The requests include, but are not limited to:

Interrogatories – Seeking information about Defendants' roles in the planning, coordination, and execution of the events in question.

Requests for Production – Seeking documents, communications, video footage, surveillance records, and internal directives related to the incidents described in the Complaint.

Requests for Admissions – Seeking to confirm Defendants' involvement in policy decisions, law enforcement directives, and media coordination.

A complete copy of the discovery requests has been provided to Defendants' counsel via email and is attached hereto as Exhibit A.

2. Procedural Context

Plaintiffs initially filed a Motion for Limited Discovery and Memorandum of Law to ensure access to relevant evidence prior to a ruling on the pending motions to dismiss. While those motions remain pending before the Court, Plaintiffs have since formally served discovery requests directly upon Defendants, as required by standard procedure.

At this time, Plaintiffs await Defendants' responses and reserve all rights to seek further court intervention if Defendants fail to comply or attempt to obstruct discovery.

3. Response Deadline and Defendants' Obligations

Pursuant to Fed. R. Civ. P. 33(b)(2), 34(b)(2)(A), and 36(a)(3), Defendants must provide full and complete responses to the discovery requests within 30 days of service, i.e., by April 19, 2025. If Defendants believe that any requested material is privileged or otherwise protected, they must produce a privilege log in compliance with Fed. R. Civ. P. 26(b)(5).

4. No Automatic Stay of Discovery

Plaintiffs note that while the Court's March 3, 2025, Endorsed Order postponed scheduling matters until after resolution of the motions to dismiss, it explicitly stated that the order "does not modify or stay any obligations the parties may have under Fed. R. Civ. P. 26." Therefore, Defendants remain obligated to engage in discovery unless and until the Court issues a specific order staying discovery.

5. Notification to the Court

Plaintiffs notify the Court of this procedural development and respectfully request that the Court consider Defendants' responses (or lack thereof) in future rulings. If Defendants fail to comply within the required timeframe, Plaintiffs reserve all rights to seek appropriate relief, including a Motion to Compel and potential sanctions under Fed. R. Civ. P. 37.

Plaintiffs will provide a status update to the Court if Defendants fail to respond within the allotted time frame or if further motions become necessary.

Respectfully submitted,

/s/ Frank Staples (Electronic Signature)
332 Merrimack Street
Manchester, NH 03103
(603) 722-5408
Absolutedefiance@protonmail.com



/s/ Kathleen Bussiere (Electronic Signature)
178 S. Main Street, Apt 3

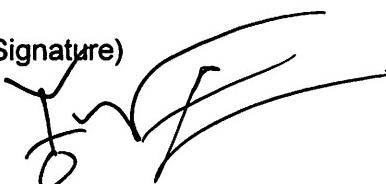
Newton, NH 03858
(603) 770-2015
kaffatina@yahoo.com

Dated: March 20, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this March 21, 2025, a true and correct copy of the foregoing Plaintiffs' Notice of Discovery Requests, along with Exhibit A, was filed electronically via the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Frank Staples (Electronic Signature)
332 Merrimack Street
Manchester, NH 03103
(603) 722-5408
Absolutedefiance@protonmail.com



/s/ Kathleen Bussiere (Electronic Signature)
178 S. Main Street, Apt 3
Newton, NH 03858
(603) 770-2015
kaffatina@yahoo.com

Dated: March 21, 2025